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August 5, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, NW
Washington, D.C. 20554

Re: Telephone Number Portability, WCB Docket No. 95-116

Dear Ms. Dortch:

On July 27, 2005, TeleGuam Holdings, LLC filed a petition with the Commission in the above docket on behalf of its wholly-owned subsidiaries, GTA Wireless and GTA Telecom, to extend the date for implementation of wireless-to-wireless local number portability ("LNP") on Guam from September 15, 2005, to December 15, 2005. This letter amplifies the record in support of that request, and also seeks additional waivers pursuant to Rule 52.31(d).

A bona fide request for wireless-to-wireless LNP was issued by GTA Wireless to the other CMRS carriers on Guam on March 15, 2005. While this request was only for wireless-to-wireless LNP, GTA Telecom was, and remains, willing to make the purchases that are needed in the wireline network in order to support wireless-to-wireless LNP. GTA has purchased the necessary equipment, but vendor delay in installing it now requires that the deadline be extended to December 15, 2005. Because of continued uncertainty as to whether the September 15th date could be made, the waiver petition was not filed until 50 days in advance of the deadline, not the 60 days required by Rule 52.31(d). TeleGuam Holdings, LLC respectfully asks that the 60 day filing requirement be waived.

Two bona fide requests for LNP on Guam were also filed by Guamcell (which is unaffiliated with TeleGuam Holdings, LLC) on April 4, 2005, for implementation by October 15, 2005. One was for wireless-to-wireless LNP, and was issued to all the CMRS carriers on Guam, including GTA Wireless. The other was for intermodal LNP, and was issued to GTA Telecom. Because the rules requiring intermodal LNP for rural incumbents had been vacated, the latter request was declined. Guamcell's wireless-to-wireless request has been incorporated into the



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earlier wireless-to-wireless BFR implementation process, and its October 15th deadline



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is jeopardized by the same vendor delay. Accordingly, TeleGuam Holdings, LLC respectfully asks that the deadline for compliance with Guamcell's wireless-to-wireless BFR also be extended to December 15, 2005. This request does meet the 60 day filing requirement of Rule 52.31(d).

Respectfully submitted,

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